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**APPENDIX B - SUMMARY OF CHANGES TO OSS PERFORMANCE
MEASUREMENTS CONTAINED IN THE NOVEMBER 6, 2000 JOINT
PARTIAL SETTLEMENT AGREEMENT (JPSA) AND DISPUTED ISSUES
REMAINING FOR COMMISSION RESOLUTION**

A. Pre-Ordering Measurements.

**Measure 1: Average Response Time (to Pre-Order
Queries).**

This measurement calculates the average time that it takes Pacific/Verizon to respond to pre-order queries. CLECs submit pre-order queries to Pacific/Verizon to determine the availability of services requested by the customer, to verify customer information (including which services the customer is currently receiving) to request a due date for a service appointment, etc. The measurement requires separate reporting based on the type of information requested. The time it takes for the CLEC to obtain a response to these queries, often while the customer is on the line, has an important effect on how the customer perceives the CLEC's capabilities.

The Settling Parties propose modifying the description of this measurement to include language regarding the inclusion of loop qualifications. They offer a new formula for calculating this measurement which reflects their agreement on measurable standards. The Settling Parties propose amending the measurable standard regarding standards for mechanized operations. The Settling Parties propose that the customer service request standard for Verizon be modified. They also propose that the measurable standard for Verizon's fully electronic data interface (EDI/COBRA) be determined at a future date, and also propose eliminating the standard for Verizon's Reject/Failed Inquiries.

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The Settling Parties also propose that Pacific's loop qualification standard be modified to reflect their agreement. The Settling Parties also request the addition of language to the "business rules" that will describe the measured interval for Pacific and Verizon, and that will explain that requests for greater than 50 working telephone numbers are excluded for Pacific. In addition, they ask for the addition of language that specifies which interfaces are measured.

The Settling Parties propose adding language to explain that fully electronic processes are measured against system hours, and manual processes are measured against business hours.

The Settling Parties also propose the deletion of language regarding the audit and information submission obligations already met by Pacific and Verizon. The Settling Parties request the deletion of language regarding Verizon's obligation to implement electronic pre-order processes, on the basis that such language defines the duties and rights of parties and, therefore, should not be part of the JPSA. The Settling Parties also ask the Commission to add language that clarifies that Verizon does not support manual engineering query for loop qualifications.

Finally, the Settling Parties propose adding language stating that Service Bureau Provider processing, availability, and response time is not counted against Pacific.

The Settling Parties disagree over a proposal to include "facility availability" information in response to a pre-ordering query, a proposal to measure all loop qualifications queries at parity, a proposal to limit the number of customer service records that can be requested in a single customer service

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record request, a proposal for Verizon to establish a manual loop qualification process, and a proposal to change customer service request measurements for Verizon. The Settling Parties have submitted these disputes for resolution by the Commission. Covad submitted and has since withdrawn a proposal to evaluate Verizon's "Held" and "Denied" sub-measures at parity.

Measurement 2: Average FOC/LSC Notice Interval.

When a CLEC submits an order for local telephone services to the ILECs, Pacific/Verizon respond with a Firm Order Confirmation (FOC) or Local Service Notice (LSC). The FOC/LSC document commits to a due date for service initiation. Measurement 2 captures the time it takes for an ILEC to return a "firm order confirmation" (FOC) or "local service confirmation" (LSC) once it receives a *valid* service request from a CLEC.

The Settling Parties propose examining response times for "valid" service requests alone. The Settling Parties also request adding language to the "reported by" section to reflect Verizon's agreement to report Standalone DSR's as a separate service group type. The Settling Parties propose adding language to the "measurable standard" section to reflect their agreement on the treatment of projects. The Settling parties also propose adding language to the measurable standard that reflects that "Interconnection Trunk Requests – Held and Denied" will be measured for Pacific at parity.

In their July filing, the Settling Parties propose extensive changes to the measurable standards for both Pacific and Verizon. In the November filing, the Settling Parties also propose adding levels of reporting disaggregation for Pacific (i.e. unbundled network element (UNE) Loop – DS3, UNE Loop – OC Level,

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UNE Dedication Transport – Optical Carrier (OC) Level, Enhanced Extended Links (EEL) – OC Level). They also propose making the measurable standards for Verizon's EEL, Subloop, and Dark Fiber service group types diagnostic.

In addition, The Settling Parties propose making Verizon's measurable standard for "Held and Denied – Interconnection Trunk Requests" a benchmark of 13 days. The Settling Parties request modifying the business rules to reflect their agreement that delays caused by customers are excluded and that loop qualification time for certain products be excluded. They also propose adding "Dark Fiber" to the list of products for which pre-qualification time will be excluded.

The Settling Parties also propose adding language (a) to explain that fully electronic processes should be tracked against system hours; (b) to exclude customer caused delays from the measurement; and (c) to reflect their agreement that days measured will be business days. They also propose adding language to reflect their agreement that the ILEC will perform pre-qualification if pre-qualification has not been completed prior to the submission of the service request by the CLEC. The Settling Parties also seek to delete language regarding projects and interim benchmarks and diagnostic reporting. They also seek to add language that reflects that the Service Bureau Provider processing, availability and response time is not counted against Pacific.

The Settling Parties continue to disagree about proposed new benchmark standards for Verizon's FOCs/LSCs, and submit this dispute for resolution by the Commission.

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Measurement 3: Average Reject Notice Interval.

When a CLEC submits a service request for local telephone services to an ILEC, Pacific/Verizon respond either with an FCO, the subject of Measurement 2, or a notice rejecting the request for service. Measurement 3 reflects the average interval from receipt of a service request to issuance of a rejection notice.

The Settling Parties propose modifying the method of calculating the measurement so that the measurement will reflect certain differences between mechanized and manual rejections. The Settling Parties also seek to update the scope of the measurement by including the high bandwidth line-sharing UNE and standalone directory listings.

Other modifications include adding language (a) to reflect the treatment of projects for Pacific under the "measurable standard" section; (b) to explain time measured for fully electronic processes and manual processes; (c) to exclude customer caused delays; (d) to exclude loop qualification time for certain Pacific products; (e) to reflect the agreement that both Pacific and Verizon will perform pre-qualification if pre-qualification has not been completed prior to the submission of the service request by the CLEC; and (f) to exclude those delays caused by the Service Bureau Provider from being counted against Pacific. The Settling Parties also propose modifying the business rules in their November 2000 filing to state that the loop qualification/facility availability interval is removed from Pacific's overall reject interval for dark fiber.

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The Settling Parties disagree about a proposal that the Commission set a new benchmark for Verizon under this measurement. The Settling Parties have submitted this dispute to the Commission for resolution.

Measurement 4: Percent of Flow Through Orders.

This measurement captures the percentage of electronically received orders that are processed on a flow-through basis, without manual intervention. Measuring flow-through is important because it gauges the efficiency with which Pacific/Verizon are processing CLEC service orders.

The Settling Parties propose treating the measurement as a "diagnostic" standard, and therefore, recommend that the Commission not establish either a benchmark or parity standard. They, however, have proposed re-examining the standard in the course of the next review proceeding. They also recommend excluding orders with syntax, but not content, errors.

There are no "open issues" regarding Measurement 4.

B. Provisioning Measurements.

Measurement 5: Percentage of Orders Jeopardized.

This measurement captures the percentage of orders processed for which Pacific/Verizon notify the CLEC that the order will not be completed by the date committed on the original Firm Order Confirmation (FOC). This measurement bears directly on the ability of CLECs to communicate accurate information to their customers.

The Settling Parties propose reporting the data captured by this measurement by Service Group Type only, and not by interface type or type of jeopardy. Thus, they request that the Commission adopt new language defining

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the measurable standard, which will reflect their agreement on this issue. They also propose adding levels of disaggregation for Pacific's reports. For Verizon, the Settling Parties also propose including language that will clarify the "retail comparison" for local number portability (LNP) by adding the words "Total Business and Residence, Non Dispatched." They also propose amending the business rules to add language that will explain that raw data will include jeopardy codes, that UNE subloop will be tracked diagnostically, and that dark fiber will be tracked diagnostically until the next periodic review. The Settling Parties also ask for the addition of language to clarify that the measurement does not capture "missed commitments."

The Settling Parties have been unable to agree about a proposal that Verizon and Pacific report results for conditioned and non-conditioned loops on disaggregated bases for digital subscriber line (xDSL) loops. The Settling Parties have submitted this dispute for resolution to the Commission.

Measurement 6: Average Jeopardy Notice Interval.

If Pacific detects that it probably will not meet the due date for service installation specified in its Firm Order Confirmation (FOC), it issues a notice to the CLEC indicating the order is in jeopardy of missing the due date.

Measurement 6 captures the average time between the completion date an ILEC states in its FOC and the date and time the ILEC issues either (a) a notice to the CLEC that the order is in jeopardy of missing the due date; or (b) a notice indicating that the due date has already been missed.

The Settling Parties have proposed adding language to clarify the method of calculation of this measurement as well as language which would

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limit reporting to service group types, instead of also reporting by interface type or type of jeopardy. The Settling Parties also propose modifying the description of "Assignment" jeopardy and "Installation" jeopardy under the "Method of Calculation" section. The Settling Parties also propose a benchmark for Pacific. The Settling Parties also request that Verizon track data for four months, at the end of which benchmarks will be set on the basis of the four months review.

The Settling Parties propose adding additional levels of reporting disaggregation for both Pacific and Verizon under the "Measurable Standards" section. They also propose making Verizon's EEL, Subloop and Dark Fiber measurements diagnostic in nature. The Settling Parties also propose to delete unnecessary language. They also propose adding business rules regarding the method by which orders classified as in jeopardy are tracked. Furthermore, they propose a description of how a jeopardy is treated on the due date for Verizon.

The Settling Parties continue to disagree about the proposal that Pacific and Verizon report results for conditioned and non-conditioned loops on desegregated bases for xDSL loops. The Settling Parties have submitted this dispute to the Commission for resolution.

Measurement 7: Average Completed Interval.

Measurement 7 examines the average number of business days it takes an ILEC to complete a valid service request, as reflected by the number of business days between the date requested and the date of completion reflected in the service order system.

The Settling Parties propose that the Commission adopt language that (a) delineates the service group types that should be reported; (b) excludes orders

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that have an interval different from the offered interval; (c) addresses the treatment of projects; (d) mandates a diagnostic tracking of dark fiber and UNE subloops (except X-DSL for Pacific) for both ILECs and for Verizon EELs; and (e) with regard to UNE loop services, excludes feature only orders from the retail analog.

The Settling Parties propose further disaggregation of Pacific's reporting as well as adding sub-measures for Pacific's xDSL, UNE Loops, and Line Sharing reports. They also propose clarifying Verizon's retail comparison for LNP to include the words, "Total Business and Residence, Non-Dispatched."

The Settling Parties also propose modifying language to reflect what they submit is the appropriate analog for DSL services. For Pacific, the Settling Parties also propose adding a business rule regarding the relevance of "Completion Date" to "Acceptance Testing." They also remove language from the "Notes" section which is no longer relevant.

The Settling Parties continue to disagree about a proposal about the definition of a "completion date" under circumstances when an "acceptance test" has been requested. Pacific has accepted a modified version of Covad's recommendation on this point, but Verizon continues to reject it. The Settling Parties submit this issue as it applies to Verizon for resolution by the Commission. Covad has also proposed that Verizon report results for conditioned and non-conditioned loops on disaggregated bases for xDSL loops.

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Measurement 8: Percent Completed Within Standard Interval.

This measurement examines the number of received, valid orders completed within a standard interval. This measurement complements information provided by measuring the Average Completed Interval and suggests the extent to which service completion times vary from an expected timeframe.

The Settling Parties propose adjusting the JPSA's language to reflect their consensus on the service group types they say should be reported. They also propose adding additional levels of disaggregation to Pacific's reports. They request that the Commission change the language of the business rules and exclude orders that have an interval different from the standard interval.

In the revised JPSA, they propose adding language that would require diagnostic tracking of UNE subloops and dark fiber for Pacific. The Settling Parties also seek to add language that will exclude "feature only" orders from the retail analog for UNE loop services. The Settling Parties propose deleting language regarding projects as well as modifying language to reflect their consensus regarding the appropriate analog for DSL services. The Settling Parties also propose modifying the "business rules" by adding a new rule for Pacific Bell which explains the relevance of "Completion Date" to "Acceptance Testing."

In their comments, Covad and NorthPoint propose a completed interval benchmark of 95% within 7 days for non-conditioned loops and 11 days for conditioned loops for Verizon's xDSL UNE loops and line sharing UNE. They also propose that the Commission establish for Pacific a completed interval

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benchmark of 95% within 5 days for non-conditioned loops and 10 days for conditioned xDSL UNE loops. Covad recommends that Pacific and Verizon report results for conditioned and non-conditioned loops on disaggregated bases for xDSL loops. Covad also seeks a modification of the definition of "completion date" under circumstances where an "acceptance test" has been administered.

Pacific has agreed to a modified version of Covad's original proposal, but Verizon continues to reject the proposal. Covad's issues with Verizon are before the Commission for resolution.

Finally, Covad proposes establishing standard intervals by service group types for Verizon's UNE services that would result in the inclusion of UNE services within this measurement. The Settling Parties do not agree on these proposals and submit them to the Commission for resolution.

Measurement 9: Coordinated Customer Conversion.

Coordinated orders require Pacific/Verizon to disconnect a customer's service. As such, the importance of Pacific/Verizon's completion of a coordinated conversion service order at the committed date and time lies in the fact that a CLEC needs to be prepared to immediately begin migrating a customer's service in order to prevent the customer from going without service. This measurement tracks the percentage of coordinated "cutovers" completed by Pacific by the committed time. The measurement also captures the percentage of coordinated orders completed by Verizon before or at the committed time.

The Settling Parties propose modifying the description of the measurement to specify that the measurement captures "cutovers" by Pacific. The Settling Parties have proposed refining the method of calculation for Verizon

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as well as the reporting structure for Pacific. The Settling Parties also seek to add language that clarifies the Pacific measure as well as defines certain terms under the Verizon measure. The Settling Parties propose the introduction of language to define "cutovers." The Settling Parties request the substitution of the term "local number portability" for "permanent number portability", the former of which is the more up-to-date technical expression.

Following the February 13, 2001 agreement between Verizon and the participating CLECs, there is no longer an open issue with respect to Measurement 9.

Measurement 9A: Frame Due Time (FDT) Conversions as Percentage on Time (Pacific Bell Only).

The Settling Parties have proposed an additional coordinated cutover measurement that examines the percentage of the number of frame due time (FDT) cutovers completed by Pacific within the initial time commitment. The Settling Parties propose calculating this measurement as the factor of 100 and the quotient of the number of frame due time cutovers completed by the committed time and the count of frame due time cutovers scheduled within a reporting period, which they suggest should be one month.

The Settling Parties propose that reports be structured to reflect results by individual CLECs, CLECs in the aggregate, Pacific, and Pacific affiliates. They propose that reports address basic loops with and without local number portability, and standalone local number portability. They seek to report results on a statewide basis. The Settling Parties request a benchmark of 95% in one hour. They also propose two business rules which would exclude CLEC caused

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misses and which limit the scope of the measurement to CLEC requested FDT orders. The Settling Parties also define "cutovers" to include initial and subsequent attempts to complete a cutover. The measurement will cover up to 19 loops or up to 99 telephone numbers on standalone local number portability.

There are no open issues regarding Measurement 9A.

Measurement 10: LNP Network Provisioning.

This measurement calculates the success rate for local number portability (LNP) network provisioning. LNP is critical to the successful development of competition in the local telephone markets. When Pacific/Verizon fail to provide LNP, customers switching to another local carrier face the possibility of interrupted service, and therefore, will have an incentive to continue purchasing services from their current providers.

The Settling Parties have proposed updating the term "permanent number portability" to reflect current usage, which is "local number portability." The Settling Parties have also sought the addition of language which would set benchmark measurements for Pacific and Verizon. Furthermore, the Settling Parties request the modification of language (a) concerning the tracking of provisioning failures; (b) limiting the broadcast exclusions to Pacific; (c) excluding large porting activities for Pacific; and (d) deleting a note regarding the implementation and timing of Verizon's reporting requirement because it is no longer relevant.

There are no open issues regarding Measurement 10.

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Measurement 11: Percent of Due Dates Missed.

This measurement examines the percentages of CLEC orders that are not completed by the due date listed on the firm order confirmation. It measures both the accuracy of the information transmitted on the firm order confirmation and the timeliness with which Pacific/Verizon complete CLEC service orders.

The Settling Parties propose adding language to reflect their agreement about the service group types that should be reported. They also request the addition of language that reflects their agreement on the exclusion of "feature only" orders from Pacific's retail analog for the UNE loop. The Settling Parties also propose refining the levels of disaggregation of Pacific's reports. They also propose to clarify Verizon's retail comparison for LNP by adding the words, "Total Business and Residence, Non-Dispatched." The Settling Parties propose the addition of language that treats dark fiber as a diagnostic measurement.

The Settling Parties also propose adding language (a) about the "record only" ILEC official orders; (b) that would require ILECs to provide disaggregation by missed appointment when requested to do so in a raw data request; (c) concerning a business rule that would clarify the link between "Completion Date" and "Acceptance Testing" for Pacific; and (d) which explains why the retail comparison for Integrated Services Digital Network (ISDN) capable UNE loops is ISDN. Finally, the Settling Parties propose deleting language regarding the analog because it is unnecessary.

The Settling Parties disagree about a proposed recommendation that the results for conditioned and non-conditioned loops be reported on

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disaggregated bases for the xDSL loops of both Pacific and Verizon and have submitted this as an open issue.

Measurement 12: Percent Due Dates Missed Due to Lack of Facilities.

This measurement is a subset of Measurement 11. It calculates the percentage of due dates that were missed because of a lack of facilities.

The Settling Parties have proposed the addition of language to reflect their agreement about the reporting of service group types. They propose the addition of language that would reflect their consensus regarding the exclusion of "feature only" orders from the retail analog for UNE loop services.

The Settling Parties also request the modification of language regarding the appropriate analog for DSL services. The Settling Parties also propose adding levels of disaggregation to Pacific's reports.

The Settling Parties disagree about a recommendation that Pacific include UNE Subloop disaggregation for this measure. This open issue is now, therefore, before the Commission.

Measurement 13: Delay Order Interval to Completion Date (For Lack of Facilities).

This measurement examines the average number of calendar days that elapse from the due date to completion date due to lack of ILEC facilities.

The Settling Parties propose (a) adding language on the measurement standards for service group types and their agreement regarding the exclusion of feature only orders from the retail analog for UNE loop services; (b) modifying language regarding the appropriate analog for DSL services; (c) adding several new levels of disaggregation to Pacific's reports; and (d) clarifying under the

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"Measurable Standard" that Verizon's retail comparison for the UNE Port is "CentraNet-Simple."

The Settling Parties disagree about a recommendation that Pacific include UNE Subloop disaggregation for this measure. This open issue is now, therefore, before the Commission.

Measurement 14: Held Order Interval.

This measurement examines the average time service orders are left incomplete because of ILEC-related reasons, including lack of facilities. It looks back from the completion date to determine how long the request was left pending. The Settling Parties propose adding language (a) about the measurable standards for service group types; (b) that would clarify that Verizon's retail comparison for UNE Port is "CentraNet-Simple"; to Verizon's retail comparison for LNP; (c) excluding "feature only" orders from the retail analog for UNE loop services. The Settling Parties also propose modifying language regarding the appropriate analog for DSL services, and adding language that would reflect their agreement that the UNE subloop and dark fiber be tracked as diagnostic measurements. The Settling Parties also propose adding business rules for Pacific which clarify the connection between "Completion Date" and "Acceptance Testing." The Settling Parties also propose that the ILECs disaggregate raw data by missed appointment codes when requested to do so. There are no open issues for Measurement 14.

Measurement 15: Provisioning Trouble Reports.

This measurement captures the number of trouble reports received from a customer (or indirectly through the CLEC the customer has migrated to)

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that occur from the time that a CLEC places a service order request with Pacific/Verizon until the time the service order is completed. It allows the Commission to compare Pacific/Verizon's processing of competitor's service orders to the manner in which Pacific/Verizon handle service orders for their own retail customers. The Settling Parties propose modifying the method of calculation by creating distinct formulas for parity and benchmark sub-measurements. The Settling Parties also request modifications to language regarding the reporting of service group types, and about the measurable standards for both ILECs' service group types. The Settling Parties propose language to clarify the benchmarks for LNP for Pacific and Verizon.

The Settling Parties also propose adding language that will indicate the availability of additional data if, and when, a CLEC requests it. They propose deleting language regarding Verizon programming and reporting obligations because the language is inappropriate for the JPSA, and deleting language about the development of measurements, because the language is no longer relevant.

The Settling Parties cannot agree about recommendations that (a) Pacific/Verizon report new services troubles prior to the completion of service orders; (b) parity with Verizon serve as a measurable standard for the local number portability sub-measure; (c) results for Verizon/Pacific's conditioned and non-conditioned loops be reported on disaggregated bases for xDSL loops and line shared loops; and (d) a parity comparison with ASI for Pacific's xDSL sub-measures serve as the measurable standard. The Settling Parties submit these disputes for resolution by the Commission.

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**Measurement 15A: Average Time to Restore
Provisioning Troubles.**

This is a new measurement proposed by the Settling Parties, which would examine how long it takes ILECs to resolve problems during the provisioning process. Measurement 15 examines the *frequency* of provisioning troubles. Measurement 15A calculates the average *duration* of trouble by dividing the duration of all provisioning troubles from the time the trouble began by the number of reports of provisioning trouble.

The Settling Parties propose reporting this measurement on a monthly basis for individual CLECs, CLECs in the aggregate, individual ILECs, and all ILEC affiliates. The measurable standard for Pacific is both parity (for Resale and UNE Loop) and a benchmark (for LNP), and it is a retail comparison for Verizon. The Settling Parties also propose that the business rules exclude CPE and IEC/CLEC caused troubles, subsequent reports, message reports, and reports generated by ILEC employees, and that raw data be disaggregated by maintenance disposition codes, when so requested by a CLEC.

The Settling Parties continue to disagree over a proposal that a parity comparison with Pacific's affiliate, ASI, serve as the measurable standard for xDSL and line shared loops. They also disagree over the recommendation that results for Verizon's and Pacific's conditioned and non-conditioned loops should be reported on disaggregated bases for xDSL loops and line shared loops. The Settling Parties have submitted this dispute to the Commission for resolution.

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Measurement 16: Percent Troubles in 30 Days for New Orders (Specials).

The Settling Parties propose revising Measurement 16 to make it strictly applicable to special services. Measurement 16 used to apply to all services for Pacific and designed services for Verizon. Measurement 17 used to apply to non-designed services for Verizon. The Settling Parties suggest making Measurement 16 the gauge for special services for both ILECs and Measurement 17 the gauge for non-special services for both ILECs.

The Settling Parties propose adding language to Measurement 16 that (a) would clarify the types of orders included in this measure; (b) the method of calculation captures only special services orders; (c) would include xDSL, UNE Loops, IDSL UNE Loops, and Line Sharing under this measure for Verizon; and (d) would address service group types. The Settling Parties propose adding several new levels of disaggregation to Pacific's reports.

The settling parties also seek to add language to the "business rules" that would reflect their agreement on necessary adjustments that Pacific would make when no orders are processed in a given month. Other changes include adding language that explains the connection between "completion date" and "acceptance testing," and adding language that would clarify that additional data from the ILECs would be made available upon request. They also seek to delete language that would pertain to non-special services, and add language that would emphasize that tracking results for UNE subloops and dark fiber would be done solely for diagnostic purposes until the next review period.

Initially the Settling Parties indicated that they could not agree about a recommendation that Verizon include xDSL when measuring percentage of

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troubles in 30 days. They submitted their dispute to the Commission for resolution. As evidenced by their proposal in their November 6, 2000 "Submission," which would include xDSL under this measurement for Verizon, the Parties have reached an agreement on this issue. The Commission will treat this as a "closed" issue. Therefore, there are no open issues regarding Measurement 16.

Measurement 17: Percent Troubles in 7 (GTE) or 10 days (Pacific) for Non-Special Orders.

The Settling Parties suggest adjusting the scope of Measurement 17 to make it the gauge for troubles with non-special services of both ILECs. Previously it applied only to non-designed services of Verizon. They propose adding language that clarifies the types of orders included in this measurement, and the method of calculation by the ILEC. The Settling Parties also seek to add language to the measurable standard that would reflect their agreement about service group types.

They propose changing the business rules to reflect their agreement on the necessary adjustments that Pacific should make when it processes no orders in a given month. The Settling Parties also seek to add language to clarify that additional data is available from the ILECs on request, as well as language that FDT and TBCC should be tracked diagnostically for Pacific. They also propose adding language that results in UNE subloops being tracked diagnostically until the next review period. The Settling Parties also propose (a) making the retail comparison for UNE Platform – Basic port and Loop for Pacific to "Business (disp/non-disp); (b) excluding xDSL, UNE Loops, IDSL UNE Loops, and Line

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Sharing from Verizon's reports under this measurement; (c) changing Verizon's benchmark for LNP to a parity measurement; and (d) adding a business rule for Pacific that explains the conceptual connection between "Completion Date" and "Acceptance Testing." There are no open issues regarding Measurement 17.

Measurement 18: Completion Notice Interval.

This measurement captures the percent of completion notices returned within the time specified in the measurable standard.

The Settling Parties propose revising the language of the measurement so that the measurement should now be reported as a percentage figure, not an average. The Settling Parties also propose reporting this measurement for all interfaces for both ILECs and modifying the language of the measurement standard to report the measurement as a percentage instead of an average figure. They also offer a new standard for Pacific for electronic orders that fall out for manual processing. The Settling Parties request the addition of language to explain that system hours be used to measure fully electronic submeasures. The Settling Parties propose deleting language regarding interim benchmarks and Verizon's programming and reporting obligations as inappropriate for the JPSA. The Settling Parties also propose modifying the benchmark standards for Verizon. They also propose adding business rules to clarify Verizon's CN reporting process, and re-writing the notes to clarify that retail disconnects are included under this measurement. Finally, the Settling Parties propose adding language that this measurement does not pertain to disconnect orders placed by the ILEC.

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The Settling Parties submitted a proposal for resolution that would have established a benchmark for Verizon's fully electronic submeasures. After their submission, Verizon and the CLECs have indicated that they now agree to the following benchmarks for Verizon:

95% within 1 hour for fully electronic, such as EDI;
95% within 12 hours for other electronic, such as WISE;
90% in 24 hours for other manual processes.

There are no open issues regarding Measurement 18.

C. Maintenance Measurements.

Measurement 19: Customer Trouble Report Rate.

This measurement calculates the number of network customer trouble reports in a calendar month, as a percentage of the total number of access lines/circuits/UNEs in service at the end of the prior reporting period. The measurement allows the Commission and the parties to compare the quality of facilities and services provided to CLECs and their customers with those provided to Pacific/Verizon customers. The Commission can thereby ensure that Pacific/Verizon is providing CLECs with services and facilities in a non-discriminatory fashion.

The Settling Parties propose (a) modifying the language of the measurement to reflect the current terminology for number portability; (b) having the measurable standard reflect their agreement regarding service group types; and (c) expanding the levels of disaggregation of Pacific's reports. Furthermore, the Settling Parties request that the business rules reflect that Verizon's results exclude provisioning trouble reports. The Settling Parties also

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propose that both ILECs include Test-OK (TOK) and Found-OK (FOK) reports under this measurement.

The Settling Parties also propose (a) adding language that will clarify that additional data from the ILEC is available upon request; (b) deleting language regarding the appropriate analog for DSL services and the development of the measure; and (c) adding language which classifies results for UNE subloops and dark fiber as diagnostic measurements.

There are no open issues under Measurement 19.

Measurement 20: Percent Customer Trouble Not Resolved Within Estimated Time.

This measurement captures the percentage of troubles reported which are not resolved within the time committed to by Pacific/Verizon. The measurement compares the timeliness with which Pacific/Verizon respond to CLEC customer troubles with the timeliness with which Pacific/Verizon respond to troubles reported by Pacific/Verizon customers. It thus enables the Commission and the parties to evaluate the extent to which CLEC customer troubles are resolved in a timely, non-discriminatory fashion.

The Settling Parties propose (a) modifying the language of the measurement to reflect the current terminology for number portability; (b) having the measurable standard reflect their agreement regarding service group types; and (c) adding several new levels of disaggregation to Pacific's reports under this measurement. Furthermore, the Settling Parties recommend that the business rules reflect that Verizon's results exclude provisioning trouble

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reports. The Settling Parties also request that both ILECs include "Test-OK" and "Found-OK" reports under this measurement.

The Settling Parties also propose (a) adding language that clarifies that additional data from the ILEC is available upon request by a CLEC; (b) deleting language regarding the appropriate analog for DSL services and the development of the measure; and (c) adding language which classifies results for UNE subloops and dark fiber as diagnostic measurements.

There are no open issues under Measurement 20.

Measurement 21: Average Time to Restore.

This measurement calculates average duration of customer trouble reports, and thus complements Measurement 20 above, which measures the percent of trouble reports resolved in a committed timeframe. The measurement compares the timeliness with which Pacific/Verizon respond to CLEC customer troubles with the timeliness with which Pacific/Verizon respond to troubles reported by their own retail customers. It thus enables the Commission and the parties to evaluate the extent to which CLEC customer troubles are resolved in a timely, non-discriminatory fashion.

The Settling Parties propose (a) modifying the language of the measurement to reflect the current terminology for number portability; (b) having the measurable standard reflect their agreement regarding service group types; and (c) adding several new levels of reporting for Pacific. Furthermore, the Settling Parties request that the business rules reflect that Verizon's results exclude provisioning trouble reports. The Settling Parties also

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propose that both ILECs include "Test-OK" and "Found-OK" reports under this measurement.

The Settling Parties also propose (a) adding language that will clarify that additional data from the ILEC is available upon request; (b) deleting language regarding the appropriate analog for DSL services and the development of the measure; and (c) adding language which classifies results for UNE subloops and dark fiber as diagnostic measurements. The Settling Parties also seek to change Verizon's LNP retail benchmark to a parity standard.

The are no open issues under Measurement 21.

Measurement 22: POTS Out of Service Less Than 24 Hours.

This measurement captures the percentage of Plain Old Telephone Service (POTS) out-of-service trouble reports that are resolved within 24 hours of the report. This measurement enables the Commission and the parties to compare the timeliness with which CLEC POTS troubles are resolved with the timeliness with which Pacific/Verizon resolve POTS troubles for their own customers.

The Settling Parties propose adding language to reflect their agreement regarding service group types, as well as language to reflect their agreement that Pacific's UNE subloops be tracked diagnostically by UNE loop type. Results will also include TOK and FOK reports for both ILECs.

There are no open issues under this Measurement 22.

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Measurement 23: Frequency of Repeat Trouble in 30-Day Period.

This measurement evaluates whether troubles are chronic in nature by capturing the percentage of repeat troubles reported within 30 days of a previous report. The measurement compares the effectiveness with which Pacific/Verizon resolve troubles reported by Pacific/Verizon customers with their effectiveness in resolving troubles reported by CLECs and their customers. It thus enables the Commission and the parties to evaluate whether Pacific/Verizon are resolving CLEC customer troubles in an effective, non-discriminatory fashion.

The Settling Parties propose (a) updating language to reflect the current industry term for number portability; (b) adding language to reflect their agreement about service group types; (c) adding language to clarify that additional data is available from the ILEC upon request in conjunction with a CLEC's request for raw data; (d) deleting language regarding the appropriate analog for DSL services; and (e) expanding the disaggregation of Pacific's reports.

There are no open issues under Measurement 23.

D. Network Performance Measurements.

Measurement 24: Percent Blocking on Common Trunks.

This measurement evaluates the percentage of common and shared trunk groups with blockage in excess of 2%.

The Settling Parties propose (a) modifying language to reflect their agreement to report by total trunk group on a statewide basis; (b) adding

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language to reflect their agreement on reporting requirements that will provide detailed information for all trunk groups not meeting the 2% level; and
(c) deleting Notes section of the measurement as no longer relevant.

The are no open issues under Measurement 24.

Measurement 25: Percent Blocking on Interconnection Trunks.

This measurement captures the percentage of dedicated interconnection trunks which experience blockage in excess of 2%. Quality network transmission is essential to a CLEC's success in a local telephone market. This measurement allows the Commission to ensure that the networks operate at a level sufficient to support a competitive environment and that Pacific/Verizon allocate trunk capacity on a non-discriminatory basis.

The Settling Parties have proposed (a) modifying language to reflect their agreement that total trunk groups be reported by individual CLEC on a statewide basis; (b) adding language that reflects their agreement to exclude failures caused by a CLEC that fails to complete growth trunk provisioning by scheduled due date; (c) changing language in the business rules section to explain when the measure applies and what it excludes; and (d) deleting language from the notes as no longer relevant.

There are no open issues under Measurement 25.

Measurement 26: NXX Loaded by LERG Effective Date.

This measurement calculates the number of telephone number prefixes (NXXs) loaded and tested by the Local Exchange Routing Guide Effective Date (LERG). LERG is an independent database that serves the telecommunications

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industry. It provides standard time intervals for the loading and testing of NXXs. Pacific's/Verizon's loading of a competitor's NXX is necessary if Pacific/Verizon customers are to be able to call the competitor's customers with that NXX. This measurement allows the Commission and the parties to compare the timeliness with which Pacific/Verizon load and test CLEC NXXs with the timeliness with which Pacific/Verizon load their own NXXs. It likewise allows the Commission to evaluate the efficiency with which Pacific/Verizon are accomplishing this important task.

The Settling Parties propose modifying the language to reflect their agreement to exclude NXX codes that cannot be completely tested because the CLEC has not provided accurate test numbers or the CLEC facilities have not been installed and adding language that would include additions and deletions to NXX codes to the measurement.

There are no open issues under Measurement 26.

Measurement 27: Network Outage Notification.

This measurement captures the average interval between a network outage and notification of a CLEC by Pacific/Verizon of the outage. This measurement compares the efficiency with which Pacific/Verizon notify their own departments of an outage with the efficiency with which Pacific/Verizon notify CLECs of an outage of the same type, and thereby allows the Commission and the parties to ensure that CLECs are notified of outages in a prompt and non-discriminatory fashion.

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The Settling Parties request the deletion of this measurement in favor of Pacific/Verizon using email notification simultaneously to their own departments and wholesale customers.

E. Billing Measurements.

Measurement 28: Usage Timeliness.

This measurement captures the average time it takes Pacific/Verizon to report usage by a CLEC customer. The measurement is calculated as the time elapsed between the time Pacific/Verizon record of usage by a CLEC customer and when the data is transmitted to the CLEC in compliant form. Timely transmission of usage data is necessary for CLECs to be able to bill their customers. This measurement allows the Commission and the parties to ensure that Pacific/Verizon are transmitting CLEC customers usage data in a non-discriminatory, timely fashion.

The Settling Parties propose modifying the language of the measurement to make the measurable standard a parity standard for most reported services. Under the "Measurable Standard" section, the Settling Parties propose that Verizon document separate sub-measures of the UNE Platform-Local and UNE Platform- Access. The Settling Parties also propose adding language to the "notes" section which will clarify Verizon's process for local/toll billing documentation.

The Settling Parties initially failed to agree about a proposal that Verizon establish a new level of disaggregation for UNE-Access.

There are no open issues for resolution under Measurement 28.

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Measurement 29: Accuracy of Usage Feed.

This measurement captures the completeness of content, accuracy of information, and correctness of formatting of usage records transmitted by Pacific/Verizon to CLECs. Accuracy of usage records enables CLECs to promptly and correctly bill their customers, an important element in the CLECs' ability to provide quality competitive service. This measurement thus enables the Commission and the parties to ensure that Pacific's/Verizon's recording and transmittal of CLEC usage data meet a high standard of quality sufficient to support a competitive local telephone market.

In our earlier decision (D.99-08-020), we directed the parties to establish criteria for the measurement and postpone setting a benchmark until then. The Settling Parties proposed that (a) the measurement be reported as a percentage of all usage records received and processed and that the measurement be reported on a monthly basis; (b) the Commission defer setting a measurable standard until the next review period or until three months of data are collected, whichever comes first; and (c) we add several new business rules.

There are no open issues for resolution under Measurement 29.

Measurement 30: Wholesale Bill Timeliness.

This measurement captures the number of days between the close of the billing cycle and the date Pacific/Verizon transmit the bill to the CLEC. This measurement enables the Commission and the parties to ensure that Pacific's/Verizon's wholesale billing of CLEC usage meets a high standard of quality sufficient to support a competitive local telephone market.

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The Settling Parties request modifying the language of the measurement in order to clarify that the measurement will examine calendar days, not business days, and adding language that reflects their agreement that Verizon will report UNE and Resale as a combined result.

The Settling Parties disagree about a proposal that sub-measures be established for Pacific's/Verizon's paper, magnetic, CD-ROM and Custom Bill diskette bills. They have submitted this issue to the Commission for resolution.

Measurement 31: Usage Completeness.

This measure captures the percentage of usage charges which appear on the correct bill. Timely, complete billing of usage enables CLECs to promptly and correctly bill their customers and collect accurate internal financial data, important elements in the CLECs' ability to provide competitive service. This measurement enables the Commission and the parties to ensure that Pacific's/Verizon's transmittal of usable bills is sufficiently complete and timely to support a competitive local telephone market.

The Settling Parties propose adding language to adjust the time period for capturing data for Pacific and adding language to reflect that Verizon will report UNE and Resale as a combined result.

There are no open issues under Measurement 31.

Measurement 32: Recurring Charge Completeness.

This measurement captures the percentage of recurring charges which appear on the correct bill. Timely, complete billing of recurring charges enables CLECs to promptly and correctly bill their customers and collect accurate internal financial data, important elements in the CLECs' ability to provide

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competitive service. This measurement enables the Commission and the parties to ensure that Pacific's/Verizon's transmittal of recurring charge bills is sufficiently complete and timely to support a competitive local telephone market.

The Settling Parties propose (a) adding language indicating that Verizon will calculate this measurement using dollar amounts; (b) modifying the language of Verizon's measurable standard; (c) adding language that reflects their agreement to exclude mandated billing changes; and (d) adding language to reflect their agreement that the measurement will be retired for Pacific 60 days after it begins reporting the proposed new measurement, Measurement 35.

There are no open issues under this Measurement 32.

Measurement 33: Non-Recurring Charge Completeness.

This measurement captures the percentage of non-recurring charges which appear on the correct bill.

The Settling Parties propose (a) adding language indicating that Verizon will calculate this measurement using dollar amounts; (b) modifying the language of Verizon's measurable standard; (c) adding language that reflects their agreement to exclude mandated billing changes; and (d) adding language to reflect their agreement that the measurement will be retired for Pacific 60 days after it begins reporting the proposed new measurement, Measurement 35.

There are no open issues under Measurement 33.

Measurement 34: Bill Accuracy.

This measurement evaluates the accuracy of Pacific/Verizon billing of CLEC usage by calculating the percentage of monies billed without corrections. Accurate billing by Pacific/Verizon enables CLECs to promptly and correctly bill

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their customers, an important element in the CLECs' ability to provide competitive service.

The Settling Parties propose adding language that reflects their agreement to exclude mandated billing changes and language that reflects their agreement that Verizon will report UNE and Resale as a combined result.

There are no open issues under Measurement 34.

Measurement 35: Duplicate Billing

The Settling Parties propose replacing this measurement, which captures the number of former Pacific customers who receive erroneous bills after conversion to a CLEC service, with a new measurement that captures the timeliness of billing completion notices. The Settling Parties propose that after Pacific implements a billing completion notice process, it will cease reporting under Measurement 32 and 33, sixty days after it commences reporting under the new Measurement 35.

There are no open issues under this measurement.

Measurement 36: Accuracy of Mechanized Bill Feed.

This measurement evaluates the accuracy of mechanized bill feeds. In our earlier decision (D.99-08-020), we directed the parties to develop a set of criteria for this measurement.

The Settling Parties now propose that the measurement be reported by individual CLEC and CLECs in the aggregate and that data be collected and appropriate benchmarks discussed at the next review or after three months of data has been collected, whichever comes first.

There are no open issues under Measurement 36.

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F. Database Updates Measurements.

Measurement 37: Average Database Update Interval.

This measurement captures the interval between the time when CLECs submit information updates, to the time when Pacific/Verizon pass the updated customer information to the directory assistance/directory listing databases.

The Settling Parties propose that (a) Pacific track LIDB service order generated updates; (b) language is added that creates a benchmark for direct gateway updates; (c) language is added to specify that the measurement reflects calendar days; and (d) language is updated to reflect Verizon's compliance with certification.

There is an open issue between the CLECs and Verizon about whether Verizon should be required to include LIDB under this measure.

Measurement 38: Percent Database Accuracy.

This measurement calculates the percentage of Emergency 9-1-1 and Directory Assistance/Directory Listings updates completed without error.

The Settling Parties propose adding language that reflects Pacific's agreement to track LIDB service order generated updates and deleting language to reflect Verizon's compliance with the independent audit ordered in D.99-08-020.

The Settling Parties have been unable to agree about a proposal that Verizon add LIDB and MSAG to the list of databases it will measure. Nor have they been able to agree that the measurement be eliminated because it is at parity by design. The Settling Parties have submitted these issues to the Commission for resolution.

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Measurement 39: E911/911 MS Database Update.

This measurement examines the efficiency with which Pacific/Verizon update Emergency 9-1-1 databases.

The Settling Parties propose adding language to clarify that service order generated updates are for Pacific only. They also propose that both Pacific and Verizon track direct gateway updates. The Settling Parties seek to clarify the Emergency 9-1-1 processing intervals.

There are no open issues under Measurement 39.

G. Collocation Measurements.

Measurement 40: Time to Respond to a Collocation Request.

This measurement captures the average time Pacific/Verizon take to respond to a CLEC request for collocation. The measurement calculates response time to two kinds of requests, namely, space availability and price/schedule quote requests.

The Settling Parties propose (a) adding language that reflects separate standards for Space Availability and Price/Schedule Quote requests; (b) adding language to specify that the measurement be reported in terms of calendar days; (c) adding language to reflect their agreement on the treatment of revised applications; (c) changing language to identify the impact of collocation request changes on processing intervals associated with power, heating, ventilation, and air conditioning (HVAC), and major building modifications; and (d) adding language to reflect the effect of large orders on Pacific's cageless collocation request processing; and (e) deleting the word "valid" before the words

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“published ILEC guidelines” in the section. The Settling Parties also propose to treat changes to a collocation application filed with Verizon after a 15 calendar day period as a new application for measurement purposes.

The CLECs and Verizon disagree over a proposal that would adjust the response intervals when ILECs receive ten or more applications within a ten-day period from an individual CLEC. The CLECs and Verizon have submitted this issue to the Commission for resolution.

Measurement 41: Time to Provide a Collocation Arrangement.

This measurement captures the average time it takes Pacific/Verizon to complete or build a collocation arrangement, both for (a) a new arrangement and (b) augmentation of an existing arrangement.

The Settling Parties propose (a) adding language to report the measurement in terms of calendar days; (b) documenting a separate sub-measure for cageless collocation under the “report by” section; (c) adding language that reflects their agreement to exclude requested due dates greater than standard interval; (d) adding language that reflects their agreement on the effect of large orders on Pacific's cageless collocation construction intervals; (e) adding a business rule which will explain the effect of CLEC delays on Pacific's reporting of collocation construction intervals; and (f) establishing new sub-measures for cageless collocation at Pacific premises.

The Settling Parties do not agree about a proposal to reduce the actual installation interval when a CLEC changes the collocation request and that change results in an interval longer than the committed installation interval.

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Pacific has agreed to a slightly modified version of the original proposal. Nor do they agree about a proposal to redefine the levels of disaggregation for Verizon collocation requests. The Settling Parties do not agree about a proposal to establish new benchmarks for Verizon's provisioning intervals. Finally, they do not agree about a proposal to establish new sub-measures for cageless collocation at Verizon premises. The Settling Parties have submitted these issues to the Commission for resolution.

H. Interface Measurements.

Measurement 42: Percent of Time Interface is Available.

This measurement evaluates the accessibility of Pacific's/Verizon's OSS systems during the time in which they are scheduled to be available. The Settling Parties propose rewording the measurement to calculate the impact on "interfaces" instead of "systems" and adding language that reflects their agreement that ILECs report affiliate data. They also propose that Verizon report data on a nationwide basis.

There are no open issues under Measurement 42.

Measurement 43: Average Notification of Interface Outages.

This measurement calculates the average time it takes for Pacific/Verizon to notify the CLECs that Pacific's/Verizon's OSS interface is experiencing an outage.

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The Settling Parties propose eliminating this measurement altogether. They propose establishing a "parity by design" process which would involve e-mailing notice of outages simultaneously to retail and wholesale customers.

There are no open issues under Measurement 43.

Measurement 44: Center Responsiveness.

This measurement captures the average time it takes for Pacific's/Verizon's ordering and repair centers to respond to a CLEC call.

The Settling Parties propose (a) adding language that reflects their agreement that Pacific report by provisioning center; (b) modifying Verizon's benchmark and adding language to reflect Pacific's agreement to report for the provisioning center as well as Pacific's agreement to a benchmark for this new sub-measure; (c) adding language to reflect that Verizon will report data on a nationwide basis; and (d) adding language to the "notes" section describing Verizon's two repair centers.

There are no open issues under Measurement 44.

I. Other Issues.

The Settling Parties propose the following *additional* modifications to OSS performance measurements and standards that affect multiple measurements:

- a. For maintenance measures for DSL (including Line Sharing), Verizon will provide separate disaggregation for UNE loops meeting standard criteria for DSL services and UNE loops that do not meet standard criteria. They propose that performance be assessed for standard UNE loops and tracked diagnostically for non-standard UNE loops.
- b. They propose certain clarifications to Verizon's definitions of service group types and respective analogs.

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- c. They propose to measure Pacific's Optical Carrier (OC) level services, including Enhanced Extended Links (EELs) as separate service group types.
- d. They propose that Pacific's report date be moved from the 15th of the month to the 20th day of the month.
- e. They propose adding language under the "Reporting Process" section which describe Pacific's commitments to reporting on the 20th day of the month, instead of the 15th.
- f. They also propose replacing Verizon's jeopardy codes with new codes.

The Settling Parties continue to disagree about the following issues:

- a. A proposal to evaluate performance results for Pacific's/Verizon's data affiliates against the better of parity or benchmark.
- b. A proposal to establish an interim benchmark for all measures that show xDSL as a parity measurement of Verizon's separate data affiliate (SDA), which is not yet operational.
- c. A proposal to move Verizon's reporting date from the 15th of the month to the 20th of the month.
- d. A proposal that Pacific provide separate disaggregation for UNE loops meeting standard criteria for DSL services and UNE loops that do not meet standard criteria. Nor do they agree that Pacific's performance will be assessed for standard UNE loops and tracked diagnostically for non-standard UNE loops.

The Settling Parties have submitted the aforementioned disputes for resolution by the Commission.

(END OF APPENDIX B)